

Mr. Paul Rawlins
Reilly Industries, Inc.
1500 S. Tibbs Avenue
Indianapolis, IN 46242-0912

RE: Exempt Construction and Operation Status
Approval #: 097-12653-00315

Dear Mr. Rawlins:

The application from Reilly Industries, Inc., received on August 16, 2000, has been reviewed. Based on the data submitted and the provisions in Indianapolis Air Pollution Control Board Regulation 2 (Permits), it has been determined that the modification and upgrade of the packaging equipment to allow switching between 25 and 1,000 kg bags packaging operations in both the USP Grade and Feed Grade packaging areas, and baghouse Stack ID 28-1 replacement to Penthouse Collector, 99.92% efficiency, maximum capacity 1,500 lb/hr, are classified as exempt from air pollution permit requirements:

Any change or modification which may increase the potential PM emissions to more than 10 tons per year from the equipment covered in this exemption must be approved by the Indianapolis Environmental Resources Management Division (ERMD), Air Quality Management Section before such change may occur.

This modification will be incorporated in the source's pending Part 70 Permit application (T 097-7552-00315).

If you have any questions concerning these matters, please call Mr. Boris Gorlin at 327-2234.

Sincerely,

Mona A. Salem
Chief Operating Officer
Department of Public Works
City of Indianapolis

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cc: files
Mindy Hahn - IDEM, OAM

Environmental Resources Management Division Air Quality Management Section

Technical Support Document (TSD) for Exempted Unit

Source Background and Description

Source Name: Reilly Industries, Inc.
Source Location: 1500 South Tibbs, Indianapolis, IN 46242-0912
County: Marion
SIC Code: 2869
Permit Number: 097-12653-00315
Permit Reviewer: Boris Gorlin

The Environmental Resources Management Division (ERMD) has reviewed a request from Reilly Industries, Inc. for the source modification, relating to the construction and operation of new equipment additionally and similar to existing packaging equipment and associated conveyors and controls (Emission Units ID ##: 28-1, 28-2, and 28-3), in order to allow switching between packaging 25 kg bags and 1,000 kg bags of both USP Grade and Feed Grade Niacinamide. Also, a new baghouse (Penthouse Collector), Emission Unit and Stack ID # 28-1, efficiency 99.92% efficiency, maximum capacity 1,500 lb/hr, was installed in June, 2000 in replacement of a similar old baghouse, with the same capacity and same Emission Unit and Stack ID #.

No other changes are requested.

Enforcement Issue

No enforcement action is pending.

Recommendation

The staff recommends to the Administrator that an exemption from air pollution permit requirements be approved for the proposed new construction. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the source's application received on August 16, 2000.

The proposed modification will not effect the production and packaging equipment capacity and will not change the existing PM PTE or actual emissions. Therefore, pursuant to the provisions in Indianapolis Air Pollution Control Board Regulation 2 (Permits), this modification is classified as exempt from air pollution permit requirements.

Federal Rule Applicability

There are no New Source Performance Standards: IAPCB Regulation 12 and 326 IAC 12; 40 CFR Part 60; 40 CFR Part 63; NESHAP applicable to this modification.

State Rule Applicability

All the State Rules and Regulations applicable to the existing source will be applicable to the proposed modification. No other Rules apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the ERMD Construction Permit Application Form Y.

The New Toxics Control Rule 326 IAC 2-1-3.4 will not apply to this new construction because a single HAP will not be emitted at a rate of 10 tons per year or more or a combination of HAPs will not be emitted at a rate of 25 tons per year or more.

Conclusion

This source modification to be exempted from air pollution control permit requirements.

This modification will be incorporated in the source's pending Part 70 Permit application (T 097-7552-00315).